

To: Singer, Joshua[Singer.Joshua@epa.gov]
From: Alex Ruppenthal
Sent: Tue 1/31/2017 4:54:58 PM
Subject: RE: Responses to questions

Hi Josh,

Thank you for the responses. Will do.

Best,

Alex

From: Singer, Joshua [mailto:Singer.Joshua@epa.gov]
Sent: Tuesday, January 31, 2017 10:31 AM
To: Alex Ruppenthal
Cc: Rowan, Anne
Subject: Responses to questions

Alex,

Please see the responses to your questions below and attribute them to U.S. EPA. Thank you.

Josh Singer

U.S. EPA, Region 5

phone: 312-353-5069

singer.joshua@epa.gov

- Has S.H. Bell Company submitted to the EPA a list of proposed monitoring site locations for review and approval, as required according to the Stipulated Settlement

and Final Consent Order (Document No. 2)? According to the consent order, S.H. Bell was required to submit proposed monitoring site locations within 30 days of the consent order, which was issued Dec. 5, 2016. Therefore, S.H. Bell's deadline would have been Jan. 5.

o NOTE: According to the EPA's complaint against S.H. Bell regarding dust pollution at its Chicago facility (No. 1), "S.H. Bell has repeatedly refused to submit proposed monitoring site locations" for PM air monitors and PM filter-based samplers.

o NOTE: S.H. Bell has requested a variation from 90-day compliance from the City of Chicago's Department of Public Health (No. 4).

EPA has received an initial proposal of monitoring site locations from S.H. Bell. EPA is currently reviewing the information and has asked for additional detail from the company. EPA is not part of the City of Chicago's Department of Public Health variance process.

- Has S.H. Bell Company provided written notice of payment to the EPA for \$50,000, as required in the consent order (No. 2)? According to the consent order, S.H. Bell's deadline for this payment would have been 30 days from the date of the order, or Jan. 5.

S.H. Bell provided written notice of payment in December 2016.

- Has the EPA asked ATSDR (Agency for Toxic Substances and Disease Registry) to perform a Health Consultation at S.H. Bell's Chicago facility to determine whether current concentrations of manganese are a threat to human health? If not, why?

o This question is based on two facts:

- A Health Consultation conducted by ATSDR at KCBX Terminals Company's two Chicago facilities (No. 2) and published Aug. 22, 2016, concluded that the source of manganese detected during the study was "likely a facility across the river from the North Terminal." The facility is very likely S.H. Bell's, according to public comments submitted to the City of Chicago submitted this month (No. 5).
- In 2016, EPA asked ATSDR whether concentrations of manganese at S.H. Bell's Ohio/Pennsylvania facility were a threat to human health (No. 6). ATSDR performed an

evaluation and on Sept. 22, 2016, concluded that manganese exposures at the facility “represent a public health hazard and should be mitigated as soon as possible to reduce harmful exposures.”

On September 22, 2016, EPA requested additional information on the potential manganese exposures for residents living near the S.H. Bell facility in Chicago, Illinois. According to an October 19, 2016 response, ATSDR does not have adequate data to make the evaluation.

- Will the air monitors that S.H. Bell is required to install based on its settlement with the EPA (No. 3) be able to determine the amount of manganese exposure at the company’s Chicago facility –and whether it poses a risk to public health?

While four of the monitors required in the settlement will be continuous particulate matter monitors, a fifth filter-based monitor is required where manganese analysis will be performed. EPA has also required the installation of a meteorological tower in order to collect data on site-specific weather patterns to apply to the monitoring data. It is EPA’s intention to share all of the data collected from these monitors with ATSDR. EPA will re-request ATSDR evaluate the Southeast Chicago community’s direct risk from the operations at S.H. Bell. It is EPA’s understanding from the October 19, 2016 ATSDR response that analysis on the community cannot be performed currently with the limited data available.

- How many tons of manganese are emitted from SH Bell’s Chicago facility per year? According to the EPA’s complaint regarding S.H. Bell’s Ohio/Pennsylvania facility, that facility “has the potential to emit over 7.2 tons of manganese per year” (No. 6)

EPA Region 5 does not have an estimate of the quantity of manganese being emitted from the S.H. Bell facility in Chicago, Illinois. EPA will be collecting manganese data from the filter-based monitor required in the settlement.

- Given that exposure to certain concentrations of manganese can cause neuromotor and neuropsychological deficits (No. 6), what steps is EPA taking to assure that residents near S.H. Bell’s Chicago facility are not at risk?

- NOTE: Compared to S.H. Bell's Ohio/Pennsylvania facility, "where approximately 1,300 people live within one mile of the facility" (No. 6), 35,045 residents live within a one-mile radius of S.H. Bell's Chicago facility, including 3,876 children age 6 and younger (No. 2).

Part of the settlement with S.H. Bell requires the company to perform several actions to reduce fugitive dust from their process. These actions are already underway. EPA is also working in consultation with ATSDR to understand the risk posed to the community from the S.H. Bell facility.